Providing the zoom feature, as shown by Gould, would not teach claim 1 even if the Examiner's reading is correct. The claimed invention calls for providing a zoom function that allows the second portion to be scaled for implementing the zoom function while the first portion of the video stream is being written. Nothing in any of the references even remotely provides any kind of rationale to produce the claimed invention.

The asserted motivation "to better identify the reproduced video data display on the display means" as asserted to be suggested by Gould certainly has nothing to do with providing a zoom function for a first portion while a second portion is being written. Simply desiring to have better zoom would not provide a motivation to make the claimed invention. If the Examiner's asserted motivation were sufficient, namely "providing a better mousetrap," then every single invention would be obvious and there would be no reason to require a rationale from within the references.

Therefore, reconsideration of the rejection of claim 1 is respectfully requested.

Claim 4 calls for retrieving two or more frames of video stream shifted by different time delays. The two or more frames are displayed. The user is allowed to select one of the frames of the video stream as a starting point for playing back the video stream.

The Section 103 rejection, based on a combination of Sata and Gould, should be reconsidered. It is not seen how Gould has even the remotest relationship to the claimed invention. No guidance is provided in any way in the office action with respect to the relevance of Gould. Therefore, a *prima facie* rejection under Section 103 is simply not made out.

The office action asserts that allowing the user to select one of the frames of the video stream as a starting point is obvious over Sata. The argument that the feature inherently present is without any support. The assertion of a proposed combination of Gould and Sata simply makes no sense whatsoever. The argument that Sata's reproducing apparatus "already include the capability to random access and retrieve the recorded video signal from the video medium in any position as desired" is unsupported by any reference to the Sata reference. It is a misreading of the Sata reference.

Even if Sata could randomly access any position in the recorded medium, which it plainly cannot, that does not teach retrieving two or more frames shifted by different time

delays. No effort is made anywhere in the office action to try to point this feature out. Similarly, no suggestion is provided in the reference of allowing the user to select one or two frames shifted by different time delays as a starting point for playing back the video stream.

Therefore, reconsideration of the rejection of claim 4 is respectfully requested.

Claim 11 calls for allowing portions of the video stream to be alternately written to and read from the storage device. That claim further calls for storing in a temporary buffer the next portion to be written to the storage device while another portion is being read from the storage device.

There is nothing in Sata that allows for alternately writing and reading video data to and from a recording medium. Moreover, there is nothing in Sata which stores in a temporary buffer the next portion to be written to the storage device while another portion is being read. There is nothing in Honjo that in any way suggests storing in a temporary buffer in an alternating writing and reading system while a portion is being read. While Honjo clearly shows a buffer circuit, it does not show storing in the buffer circuit the video data while the data is being read.

Honjo relates to a method of forming optical disks by recording information thereon. There is no effort whatsoever to read from the disk. All that the buffer does is buffer the information so that when the buffer is full, the data may be provided to the recording circuit for recording on the optical disk 7. See column 2, lines 56+. There is nothing in Honjo which teaches storing in the temporary buffer the next portion to be written to the storage device "while another portion is being read from the storage device." Even if one had found a rationale to combine Sata with Honjo, which seems hard to understand in view of the different media involved, he would not reach the claimed invention, because there is no teaching of storing in the temporary buffer, the next portion to be written while another portion is being read. Neither Honjo or Sata store one portion while another portion is being read.

The same rationale applies to claim 20.

Claim 21 calls for storing data in a plurality of buffers and transferring data from at least two buffers at a time, to and from the storage device. The combination of Sata and Honjo never discloses in any way the use of two buffers, even if there were some

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rationale to teach the use of two buffers. Similarly, there is no teaching of transferring data from at least two buffers at a time, to and from a storage device.

Therefore, reconsideration of the rejection of claim 21 is respectfully requested.

In view of these remarks, the application is now in condition for allowance and the Examiner's prompt action in accordance therewith is respectfully requested.

Respectfully requested,

Date: 6/5/02
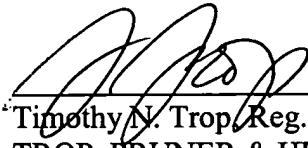
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